

# Exhibit C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

**STIPULATION**

TELEMAQUE LAVIDAS, : 19 Cr. 716 (DLC)

Defendant. :

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IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by Audrey Strauss, Attorney for the United States, Acting Under Authority Conferred by 28 U.S.C. § 515, Richard Cooper and Daniel Tracer, Assistant United States Attorneys, of counsel, and defendant Telemaque Lavidas, by and through his counsel, Jonathan Streeter, Esq., Jennifer Achilles, Esq., and Eric Sussman, Esq., that:

1. Government Exhibit 201 and all portions and subdivisions thereof are true and accurate trading records from July 2013 to January 2017 maintained by Charles Schwab for account 443-8387, which was held in the name of George Nikas. Event times recorded in GX-201 and all portions and subdivisions thereof are in Eastern Time.

2. Government Exhibit 202 and all portions and subdivisions thereof are true and accurate trading records from January 2012 to October 2015 maintained by ETrade for account 5639-2938, which was held in the name of Steve Makris.

3. Government Exhibit 203 and all portions and subdivisions thereof are true and accurate trading records from October 2012 to October 2015 maintained by ETrade for account 5555-4494, which was held in the name of Steve Makris and Julia Makris. Julia Makris is a close relative of Steve Makris.

4. Government Exhibit 204 and all portions and subdivisions thereof are true and accurate trading records from January 2012 to October 2015 maintained by ETrade for account 5565-8622, which was held in the name of Stefanos Makris. Stefanos Makris is a close relative of Steve Makris.

5. Government Exhibit 205 and all portions and subdivisions thereof are true and accurate trading records from January 2012 to October 2015 maintained by ETrade for account 5560-6950, which was held in the name of SM Investments. SM Investments was beneficially owned by Steve Markis.

6. Government Exhibit 206 and all portions and subdivisions thereof are true and accurate trading records from January 2012 to September 2015 maintained by ETrade for account 5959-6155, which was held in the name of Danielle Makris. Danielle Makris is the wife of Steve Makris.

7. Government Exhibit 207 and all portions and subdivisions thereof are true and accurate trading records from December 2013 to April 2019 maintained by Interactive Brokers

for account U1282867, which was held in the name of Marc Demane Debih.

8. Government Exhibit 208 and all portions and subdivisions thereof are true and accurate trading records from September 2014 to December 2014 maintained by Interactive Brokers for account U1336671, which was held in the name of Dov Malnik.

9. Government Exhibit 209 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to December 2014 maintained by Interactive Brokers for account U1085078, which was held in the name of ISP Securities. ISP Securities was beneficially owned by Dov Malnik.

10. Government Exhibit 210 and all portions and subdivisions thereof are true and accurate trading records from January 2011 to April 2016 maintained by Interactive Brokers for account U988200, which was held in the name of Georgios Kordakis.

11. Government Exhibit 211 and all portions and subdivisions thereof are true and accurate trading records from February 2015 to August 2015 maintained by Interactive Brokers for account U1479624, which was held in the name of Sea Lion Marine Company Ltd. Sea Lion Marine Company Ltd. was beneficially owned by Ioannis Xylas.

12. Government Exhibit 212 and all portions and subdivisions thereof are true and accurate trading records from May 2013 to February 2016 maintained by Interactive Brokers for account U8817323, which was held in the name of Upbeat Worldwide Investments Limited. Upbeat Worldwide Investments Limited was beneficially owned by Tomer Feingold.

13. Government Exhibit 213 and all portions and subdivisions thereof are true and accurate trading records from April 2014 to December 2014 maintained by Interactive Brokers for account U1345119, which was held in the name of Ioannis Xylas.

14. Government Exhibit 214 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to May 2017 maintained by Saxo Bank for account 33888/6897SCM, which was held in the name of Marc Demane Debih.

15. Government Exhibit 215 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to October 2015 maintained by DFSA for accounts 4647632 and 5694136, which were held in the name of Georgios Nikas and Alexandra Nika respectfully. Alexandra Nika is a close relative of Georgios Nikas.

16. Government Exhibit 216 and all portions and subdivisions thereof are true and accurate trading records from

January 2010 to August 2014 maintained by Wells Fargo for account 1034-7491, which was held in the name of Paolo Jelmoni.

17. Government Exhibit 217 and all portions and subdivisions thereof are true and accurate trading records from June 2011 to June 2015 maintained by IG for account BAJ09, which was held in the name of Compania International Financiera S.A. Compania International Financiera S.A. was beneficially owned by Yomi Rodrik.

18. Government Exhibit 218 and all portions and subdivisions thereof are true and accurate trading records from November 2011 to July 2013 maintained by IG for account BAJ10, which was held in the name of Coudree Capital Gestion S.A. Coudree Capital Gestion S.A. was beneficially owned by Yomi Rodrik.

19. Government Exhibit 219 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to December 2015 maintained by Banque Ohman for account OHM001, which was held in the name of Compania International Financiera S.A.

20. Government Exhibit 220 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to December 2014 maintained by Banque Ohman for account OHM002, which was held in the name of Coudree Capital Gestion S.A.

21. Government Exhibit 221 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to June 2015 maintained by Banque Ohman for account 2100717 and 2101061, which was held in the name of Compania International Financiera S.A and Coudree Capital Gestion S.A. respectfully.

22. Government Exhibit 222 and all portions and subdivisions thereof are true and accurate trading records from September 2013 to December 2015 maintained by Banque Ohman for account 2103257, which was held in the name of Compania International Financiera S.A.

23. Government Exhibit 223 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to July 2013 maintained by Fidelity for account Z70-570680, which was held in the name of George Nikas and Miranda Nikas. Miranda Nikas is the wife of George Nikas.

24. Government Exhibit 224 and all portions and subdivisions thereof are true and accurate trading records from January 2013 to July 2014 maintained by IG for account DK334, which was held in the name of Marc Demane Debih.

25. Government Exhibit 225 and all portions and subdivisions thereof are true and accurate trading records from March 2015 to April 2016 maintained by Maybank for accounts

CFD001501 and KEUK01501, which was held in the name of Marc Demane Debih.

26. Government Exhibit 226 and all portions and subdivisions thereof are true and accurate trading records from February 2014 to October 2018 maintained by Valbury Capital for account VC0000007, which was held in the name of Marc Demane Debih.

27. In light of the fact that Government Exhibits 201 through 226 are voluminous, the parties agree that for ease of reference, pages within those exhibits may be separately marked (e.g., within Government Exhibit 201, certain pages of that exhibit may be marked Government Exhibit 201-1, Government Exhibit 201-2, etc.).

28. The records reflected in the above-described exhibits were made at or near the time that the activity reflected in those records took place; they were made by, or based on information transmitted by, a person with knowledge of the matters set forth in the records; they were kept in the course of a regularly conducted business activity, and it was the regular practice of those businesses to maintain the records.



IT IS FURTHER STIPULATED AND AGREED that this Stipulation  
is admissible in evidence as a Government Exhibit at trial.

Dated: New York, New York  
December \_\_, 2019

AUDREY STRAUSS  
Attorney for the United States,  
Acting Under Authority Conferred  
by 28 U.S.C. § 515

By: \_\_\_\_\_  
Richard Cooper  
Daniel Tracer  
Assistant United States Attorneys

\_\_\_\_\_  
Jonathan Streeter  
Dechert LLP

Jennifer Achilles  
Eric Sussman  
Reed Smith LLP  
Attorneys for Defendant